Ellie Jones

From: Neil Bayliss <Neil.Bayliss@heneb.org.uk>
Sent: 03 July 2025 12:28
To: planning
Subject: FAO: Dafydd Thomas RE: P/2025/0480 at 32-36 BRIDGE STREET, WREXHAM
Attachments: Heneb Clwyd-Powys March 2025 Registered Contractors.pdf; Heneb Clwyd-Powys July 2025 - Evaluation .pdf

Good morning, Dafydd,

Regarding the planning application referenced above.

Information retained within the Regional Historic Environment Record indicates that the proposed apartment is located on the site of buildings which are shown on the 1st edition Ordnance Survey mapping of the Mid-19th century. The area was subject to an evaluation in 2004, where contrasting archaeological results were gained. One trench provided limited archaeological results, with cellars truncating the potential Medieval horizon, whereas in another trench the Medieval deposits were revealed within the top 1.2 metres of the excavation.

This proposed development will disturb any archaeological remains surviving in the area, but from present knowledge it is impossible to estimate how damaging this might be, and thus to frame an appropriate archaeological response. The planning authority has insufficient information about this archaeological resource, or the applicant's intended treatment of it, to make a balanced decision. As archaeology is a material consideration here, I would advise that this application is not determined until this resource has been evaluated. In this case two trenches should be excavated on the house foundation lines, if accessible, to evaluate the site. The ground may also have to be re-instated after for safety and continued use post-evaluation.

Welsh Government Planning Policy Wales (Edition 12, Feb 2024), TAN 24: the Historic Environment (May 2017) suggest that planning authorities should require applicants to supply a suitable archaeological assessment in support of an application where a potential impact to archaeological remains is identified.

The specific guidance is stated in:

Planning Policy Wales (Feb 2024):

Paragraph 6.1.26

Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.

This means that Local Planning Authorities in Wales must take into account archaeological considerations and deal with them from the beginning of the development control process and need to be fully informed about the nature and importance of archaeological remains, and their setting, and the likely impact of any proposed development upon them.

Technical Advice Note 24 (May 2017):

Paragraph 4.7.

'Where archaeological remains are known to exist, or considered likely to exist, and a study has not already been undertaken by the applicant, the local planning authority should ask an applicant to undertake a desk-based archaeological assessment and, where appropriate, an archaeological evaluation. These should be done by a qualified and competent expert to the appropriate standard. The reports of these investigations

will form part of the planning application. Applicants should show they have modified their development proposals to minimise any negative impact on the identified archaeological remains, and how they intend to mitigate any remaining negative impacts.'

The evaluation will include pre-determination ground investigations using targeted trial trenching of the site. All work will be completed in accordance with the relevant CIfA standards and guidance on evaluation and project archiving and reporting.

The developer will preferably engage a CIfA registered archaeological contractor to complete this work in accordance with an approved written scheme of investigation (WSI) which will be supplied by the archaeological contractor and approved by us in advance of commencement of the investigation. There are Listed Buildings directly northeast of the site and the development would also require a consultation with the Built Heritage Conservation Officer.

Kind regards,

Neil

Heneb

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